

respectfully submit that the referenced plates disclosed by the Baillie patent are structural elements that have completely different functional application than the sieve element of Applicants' claims 1-8.

The diffusion plate (41) of the Baillie patent is placed within a regenerator (48). Column 12, lines 11-15. Stripped catalyst particles from the stripper (34) are combined with an oxygen-containing gas, such as air. Column 12, lines 1-20. This combination flows upwardly through a riser or pipe (40) and through the diffusion plate (41) into the regenerator (48) wherein carbon deposited on the catalyst particles is combusted. *Id.* Above the diffusion plate is a fluidized bed of catalyst (42). Column 12, lines 10-15. The plate (121) with holes has a similar relationship as does the diffusion plate to other elements of the regenerator. See column 20, line 54 – column 21, line 22.

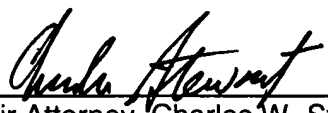
The sieve plate of Applicants' claimed invention is substantially different from the referenced plates of the Baillie patent both in terms of its structural relationship to other associated elements of the apparatus and in terms of its function. The sieve recited in claims 1-8 is positioned within the circular housing of a separator and covers the inlet to its dipleg. One of its functions is to prevent large coke particles from entering the dipleg of the separator. This is a hugely different structure and function from those of the plates of the Baillie patent that are pointed to by the Examiner as being equivalent to Applicants' recited sieve. The diffusion plate of the Baillie patent is positioned within a regenerator, as opposed to a cyclone separator, and it does not cover a dipleg. The function of the diffusion plate appears to be to diffuse the upward flow of a mixture of catalyst and air so as to assist in the provision of a fluidized bed of catalyst particles.

II. Conclusion

In view of the aforescussed differences, Applicants respectfully suggest that the claims pending in this application are patentably distinguishable over the Baillie patent. Early allowance of the claims pending in this application is, therefore, respectfully requested.

Respectfully submitted,

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